REMARKS

Claims 1-19 are currently pending, with claims 1, 8, 14 and 15 being the independent claims. No new matter has been added. Reconsideration of the application is respectfully requested.

Claims 1-19 have been rejected under 35 U.S.C. §112, 1st paragraph, as failing to comply with the written description requirement. According to the Examiner, "page 8, lines 7 – 12 and 15 – 17 as cited by applicant, fails to describe and support the newly added limitations as to reasonably convey one skilled in the art that the inventor(s), at the time the application was filed, had possession of the claimed invention". For at least the following reasons, reconsideration and withdrawal of the rejection is requested.

It should be noted that pg. 8, lines 7-12 and 15-17 of the specification were exemplary citations for the written description of the subject matter that supports the added limitations. Consequently, the originally filed specification clearly conveys to one skilled in the art that the inventor(s), at the time the application was filed, had possession of the claimed invention.

For example, pg. 3, lines 4-6 of the originally filed specification states that a "customer base can be increased more efficiently by enabling users of non-WAP-enable terminals to have access to WAP services". In addition, pg. 4, lines 6-9 describes that "the interface module converts the data into a format that can be displayed on a conventional television screen. An advantage of using a conventional television screen is that greater textual and graphical information can be displayed to the user, as compared to the display of the mobile terminal." Pg. 4, lines 12-15 further describes another aspect of the claimed invention in which "the interface module connects to a data bus of the mobile terminal so that data may be received or transmitted through the mobile terminal. The interface module includes a user agent (e.g., a Web browser) for presenting the data on a television screen".

Bearing this in mind, the claimed invention is directed to providing a way for users that do not have, for example, a WAP enabled device to obtain WAP enabled services. This is achieved by displaying information on a device that can more readily accommodate this information, such as a television (TV). Consequently, as illustrated in FIGS. 1 and 2 of the instant specification, the mobile terminal is shown connected to an interface module 22 for processing data from the mobile terminal 12, and a display device 24 (e.g. a television or

computer monitor) is shown connected to the interface module 22 for presenting textual, audio and/or video data received from a service provider through the mobile terminal 12. As described at pg. 7, lines 17-18 of the originally filed specification, in such a configuration, the interface module 22 may control transmission of data to and from the mobile terminal 12.

As further described and claimed, the interface module comprises, *inter alia*, a signal generator for converting decoded data from a user agent into signals formatted for processing by an output device so that the output device presents at least one of audio, video, and textual information to the user based on the signals. This is specifically described at pg. 7, lines 18 thru pg. 8, line 4 of the instant application, i.e., the interface module comprises (1) WAP protocol stack 28 for processing WAP encoded data (e.g., exchange of data objects) to and from a data service provider, (2) Short Message-Transport Protocol (SM-TP) protocol stack 28' for communicating short textual messages to and from a Short Message Service Center (e.g., SMS gateway), (3) a user agent 30 for interpreting or decoding the WAP data and/or SM-TP data, and (4) a signal generator 32 for converting the decoded data from the user agent 30 and generating signals (e.g. TV signals) formatted for presentation on the display device 24. Consequently, if the mobile device is unable to display the data that is received, then that received data is displayed on another output device.

Applicant has disclosed and described that it is the interface module that performs the determination of where received information should be displayed. Page 8, lines 8-10 states that "the interface module 22 may access user or subscriber specific data such as user agent profile information that indicates, for example, WAP capability of the mobile terminal 12 and subscription information of the user". Therefore, the specification provides support for concluding that the interface module determines whether the mobile device is configured to display the received data, as claimed. Moreover, FIG. 2 shows that the mobile terminal 12 and the TV monitor are each connected to the interface module, where the interface module includes the protocol stack(s) 28, user agent 30 and signal generator 32.

Lastly, pg. 8, lines 14-17 of the specification states that "when the mobile terminal 12 is powered on, the interface module 22 transmits user agent profile information to the WAP gateway 20 through the mobile terminal 12". The WAP gateway 20 receives the user agent profile information and takes note of the WAP capability of the mobile terminal 12 so that appropriate WAP content may be transmitted thereto".

Clearly the claimed subject matter is described in the originally filed specification such that a person skilled in the art could derive that "the interface module determines whether the mobile terminal is configured to display the received data; and wherein the decoded data is displayed on the remote output device if the mobile terminal is not configured to display the received data". In view of the foregoing, independent claims 1, 8, 14 and 15 comply with the written description requirement and do not contain new matter. Therefore, withdrawal of the rejection under 35 U.S.C. §112, 1st paragraph is in order, and a notice to that effect is requested.

In the Office Action dated July 25, 2006, independent claims 1, 8, 14 and 15, and dependent claims 2-7, 9-13 and 16-19 were rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,301,471 ("*Dahm*") in view of U.S. Patent No. 5,732,074 ("*Spaur*"). For at least the following reasons, it is respectfully submitted that all claims of the present application are patentable over the cited reference.

Independent claims 1 and 14 have recited the limitations "wherein the interface module determines whether the mobile terminal is configured to display the received data; and wherein the decoded data is displayed on the remote output device if the mobile terminal is not configured to display the received data". The combination of *Dahm* and *Spaur* fails to teach at least this aspect of the claimed invention.

Dahm relates to a system and method which permits mobile service providers to identify subscribers who may be at risk to churning, and once identified, present those identified with an opportunity to review and execute an upgraded service plan better suited to their needs (see col. 3, lines 53-59). *Dahm* states, "the system and method allows the identified mobile subscribers to efficiently, visually and interactively, review the offered mobile service plan better meeting the subscriber's needs. The subscriber can review and execute the offer using the display and interface of a mobile device" (see Abstract). However, *Dahm* fails to teach or suggest that an "interface module determines whether the mobile terminal is configured to display the received data, [where] the decoded data is displayed on the remote output device if the mobile terminal is not configured to display the received data", as recited in amended independent claims 1 and 14.

Dahm (col. 9, lines 17-22) states, "mobile device 250 includes a corresponding WCP interface 252 that couples to wireless network 245 via a RF transceiver (not shown) to receive incoming and outgoing data signals. It is understandable that WCP interface 252 is implemented with a UDP interface, as does WCP interface 206, when wireless network 245 operates HDTP."

Dahm (col. 9, lines 22-25) further states, when "other wireless communication protocol is operated in wireless network 245, both WCP interface 252 and WCP interface 206 are readily implemented accordingly so that proxy server 200 and mobile device 250 can understand and communicate [with] each other." In addition, *Dahm* (col. 9, lines 28-29) states, "device identifier (ID) storage 254 supplies a device ID to UDP interface 252. *Dahm* (col. 9, lines 39-45) also teaches that the client module 256 is coupled to UDP interface 252 for the establishment of a communication session and the requesting and receiving of data". Additionally, the client module 256 operates, among other things, a browser 264, commonly referred to as micro-browser, requiring much less computing power and memory than well-known HTML browsers do.

Dahm (col. 9, lines 28-41) states, "device identifier (ID) storage 254 supplies a device ID to UDP interface 252. The device ID identifies a specific code that is associated with mobile device 250 and directly corresponds to the device ID in the user account provided in proxy server device 200. In addition, mobile device 250 includes a client module 256 that performs many of the processing tasks performed by mobile device 250 including establishing a communication session with proxy server device 200, requesting and receiving data from carrier network 208, displaying information on a display screen 260 thereof, and receiving user input from keypad 262 as well. The client module 256 is coupled to UDP interface 252 for the establishment of a communication session and the requesting and receiving of data". That is, (col. 9, lines 17-41) teaches nothing more than the internal configuration of the disclosed mobile station. Thus, *Dahm* teaches aspects associated with establishing a communication session. However, there is nothing with respect to determining which device should display received data.

Dahm (col. 9, lines 58-60) states, "information is exchanged between mobile device 402 and proxy server 404 upon establishment of a communications session between the two devices". *Dahm* (col. 60-65) teaches that the communications session is conducted using a wireless communications protocol, such as Wireless Access Protocol (WAP) or Handheld Device Transport Protocol (HDTP)). However, *Dahm* fails to teach that the determination is performed with respect to an interface module that determines whether the mobile terminal is configured to display the received data (i.e., whether the mobile terminal is WAP enabled), where the decoded data is displayed on the remote access device if the mobile terminal is not configured to display the received data. In *Dahm*, the data is output to the display of the mobile station at all times. That is, there is no determination with respect to where the information should be displayed.

The Applicant also notes that Claims 1, 8, 14 and 15 have been amended to more clearly set forth various aspects of the invention as supported by the original Specification. For example, Claim 1 has been amended to establish the distinct nature of the interface module of Claim 1 from the mobile terminal, and that it is not an internal component of a standard mobile phone that is not accessible for use by a user. Rather, a user of the system of Claim 1 can choose to couple the interface module to his/her mobile terminal in order to enable what can't be displayed (or would prefer to be displayed) on the remote output device rather than on the display of the mobile terminal. Neither *Dahm* nor *Spaur* teach or suggest at least this additional limitation, either alone or in combination.

The Examiner concedes *Dahm* fails to teach or suggest an output device "remotely located from the mobile terminal". *Spaur* has been cited to provide this feature. However, Applicant's review of *Spaur* reveals that the only relevant feature taught by *Spaur* is a computer terminal (60) attached to a modem (64). However, there is nothing in *Spaur* with respect to the additional features recited in amended claims 1 and 14. Thus, *Spaur* fails to cure the deficiency of *Dahm*. In view of the foregoing, independent claims 1 and 14 are patentable over the combination of *Dahm* and *Spaur* and, thus, reconsideration and withdrawal of the rejections under 35 U.S.C. §103 are in order, and a notice to that effect is requested.

Independent claims 8 and 15 are method claims associated with independent system claims 1 and 14, respectively. Accordingly, independent claims 8 and 15 are patentable over the cited combination of *Dahm* and *Spaur* for the reasons discussed above with respect to independent system claims 1 and 14.

In view of the patentability of independent claims 1, 8, 14 and 15, for the reasons set forth above, dependent claims 2-7, 9-13 and 16-19 are all patentable over the prior art.

Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is requested.

Applicant respectfully submits that the application is in condition for allowance: If the Examiner believes it necessary or otherwise helpful, the undersigned attorney of record may be contacted at 952.854.2700 (ext. 11) to discuss any issues related to this case.

Respectfully submitted,

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